

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

SHANE GUAY,

Defendant.

19-CR-103-LJV-HKS

NOTICE OF MOTION

MOTION BY:

Jeffrey T. Bagley, Assistant Federal Public Defender.

DATE, TIME & PLACE:

Before the Honorable H. Kenneth Schroeder, Jr.,
United States Magistrate Judge, Robert H. Jackson
United States Courthouse, 2 Niagara Square,
Buffalo, New York, **on the papers submitted.**

SUPPORTING PAPERS:

Affirmation of Assistant Federal Public Defender
Jeffrey T. Bagley, dated March 4, 2020.

RELIEF REQUESTED:

Amend Defendant's Conditions of Release.

DATED:

Buffalo, New York, March 4, 2020.

Respectfully submitted,

/s/Jeffrey T. Bagley

Jeffrey T. Bagley
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Counsel for Defendant Shane Guay

TO: Meghan A. Tokash
Assistant United States Attorney
Western District of New York
138 Delaware Avenue, Federal Centre
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

19-CR-103-LJV-HKS

v.

AFFIRMATION

SHANE GUAY,

Defendant.

JEFFREY T. BAGLEY, affirms under penalty of perjury that:

1. Mr. Guay is currently released awaiting trial on the condition of home incarceration.
2. Through counsel, Mr. Guay moves to amend that condition to home detention, which would allow Mr. Guay to attend pre-approved activities outside the home.
3. In AO form 199B, entitled “Additional Conditions of Release,” this condition reads: “You are restricted to your residence at all times except for employment; education; religious services; medical, substance abuse, or mental health treatment; attorney visits; court appearances; court-ordered obligations; or other activities approved in advance by the pretrial services office or supervising officer.”

4. Mr. Guay's Supervising Probation Officer, Michael Macaluso, consents to this request, and Assistant United States Attorney Meghan Tokash also has no objection.

DATED: Buffalo, New York, March 4, 2020.

Respectfully submitted,

/s/Jeffrey T. Bagley

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